

LABATON KELLER SUCHAROW LLP
Thomas A. Dubbs (*pro hac vice forthcoming*)
(tdubbs@labaton.com)
Michael P. Canty (*pro hac vice forthcoming*)
(mcanty@labaton.com)
Thomas G. Hoffman, Jr. (*pro hac vice forthcoming*)
(thoffman@labaton.com)
140 Broadway
New York, New York 10005
Tel: (212) 907-0700
Fax: (212) 818-0477

LATHAM & WATKINS LLP
Joshua G. Hamilton (#199610)
(joshua.hamilton@lw.com)
Michael J. Reiss (#275021)
(michael.reiss@lw.com)
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: 424 653 5500

Attorneys for the Debtors and Reorganized Debtors

Attorneys for Lead Plaintiff the Public Employees Retirement Association of New Mexico and Lead Counsel for the Class

[Additional Counsel appear on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Case No. 4:24-cv-07449 HSG

(Bankruptcy Court Case No. 19-30088-DM)

**STIPULATION TO EXTEND DEADLINE
AND ORDER**

In re:

PG&E Corporation,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

WHEREAS, on September 26, 2024, the Reorganized Debtors filed Reorganized Debtors' Unopposed Motion for Extension of Time to File Notice of Appeal and Motion for Leave to Appeal

1 in the Bankruptcy Court (Bankruptcy Case No. 19-30088, ECF 14597) (“Motion for Extension”),
2 seeking a 21-day extension;

3 WHEREAS, in the Motion for Extension, the Reorganized Debtors stated that “Counsel for
4 PERA conditioned PERA’s non-opposition [to the Motion for Extension] on PG&E’s agreement
5 not to oppose PERA having reciprocal time to oppose PG&E’s motion for leave to appeal, should
6 PG&E file such a motion. PG&E agrees to that condition.” (Motion for Extension at 2, n.1);

7 WHEREAS, the RKS Claimants also consented to the Reorganized Debtors’ Motion for
8 Extension;

9 WHEREAS, on September 26, 2024, the Bankruptcy Court granted the Motion for
10 Extension and ordered October 24, 2024, as the deadline for the Reorganized Debtors to file a
11 Motion for Leave to Appeal (Bankruptcy Case No. 19-30088, ECF 14599);

12 WHEREAS, on October 24, 2024, the Reorganized Debtors filed their Notice of Appeal and
13 Motion for Leave to Appeal (Bankruptcy Case No. 19-30088, ECF 14618-14619); and

14 WHEREAS, pursuant to PERA and the Reorganized Debtors’ agreement to provide a
15 reciprocal extension of time for PERA to respond to the Notice of Appeal and Motion for Leave to
16 Appeal (Bankruptcy Case No. 19-30088, ECF 14597 at 2, n. 1) and the RKS Claimants’ request for
17 additional time;

18 NOW, THEREFORE, it is stipulated and agreed among the undersigned Parties, and
19 respectfully submitted for the Court’s approval as follows:

20 1. PERA’s response to the Notice of Appeal and Motion for Leave to Appeal (ECF
21 14618-14619) shall be filed no later than December 3, 2024, or as otherwise directed by the Court.
22 The RKS Claimants’ response to the Notice of Appeal and Motion for Leave to Appeal (ECF
23 14618-14619) shall likewise be filed no later than December 3, 2024, or as otherwise directed by
24 the Court.
25
26
27
28

1 DATED: November 5, 2024

/s/ Michael P. Canty

2 Michael P. Canty (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
3 Thomas A. Dubbs (*pro hac vice forthcoming*)
Michael P. Canty (*pro hac vice forthcoming*)
4 Thomas G. Hoffman Jr. (*pro hac vice forthcoming*)
140 Broadway
5 New York, NY 10005
Telephone: (212) 907-0700
6 Facsimile: (212) 818-0477
7 Email: tdubbs@labaton.com
mcanty@labaton.com
8 thoffman@labaton.com

9
10 *Counsel for Lead Plaintiff the Public Employees
Retirement Association of New Mexico*

11 WAGSTAFFE, VON LOEWENFELDT, BUSCH &
12 RADWICK, LLP
James M. Wagstaffe (#95535)
13 Frank Busch (#258288)
100 Pine Street, Suite 725
14 San Francisco, California 94111
Telephone: (415) 357-8900
15 Facsimile: (415) 371-0500
16 Email: wagstaffe@wvbrlaw.com
busch@wvbrlaw.com

17
18 *Liaison Counsel for Plaintiffs*

19 ROBBINS GELLER RUDMAN & DOWD LLP
Willow E. Radcliffe (#200087)
20 Kenneth J. Black (#291871)
Post Montgomery Center
21 One Montgomery Street, Suite 1800
22 San Francisco, CA 94104
Telephone: 415/288-4545
23 415/288-4534 (fax)
willowr@rgrdlaw.com
24 kennyb@rgrdlaw.com

25 ROBBINS GELLER RUDMAN & DOWD LLP
26 Darren J. Robbins (#168593)
Brian E. Cochran (#286202)
27 655 West Broadway, Suite 1900
San Diego, CA 92101
28 Telephone: 619/231-1058

619/231-7423 (fax)
darrenr@rgrdlaw.com
bcochran@rgrdlaw.com

Counsel for the Securities Act Plaintiffs

VANOVERBEKE, MICHAUD & TIMMONY, P.C.
Thomas C. Michaud
79 Alfred Street
Detroit, MI 48201
Telephone: (313) 578-1200
Facsimile: (313) 578-1201
Email: tmichaud@vmtlaw.com

Additional Counsel for the Securities Act Plaintiffs

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
Colleen Restel (*pro hac vice*)
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: 973.597.2500
Facsimile: 973.597.2400
Email: metkin@lowenstein.com
abehlmann@lowenstein.com
scargill@lowenstein.com
crestel@lowenstein.com

*Special Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

MICHELSON LAW GROUP
Randy Michelson
220 Montgomery St., Suite 2100
San Francisco, California 94104
Telephone: 415.512.8600
Facsimile: 415.512.8601
Email:
randy.michelson@michelsonlawgroup.
com

*Local Bankruptcy Counsel to Securities
Lead Plaintiff and the Class*

/s/ Richard A. Bodnar
ROLNICK KRAMER SADIGHI LLP
Richard A. Bodnar (*pro hac vice*)
PENN 1, Suite 3401
One Pennsylvania Plaza
New York, NY 10119

Telephone 212.597.2800
Facsimile 212.597.2801

Counsel for the RKS Claimants

/s/ Michael J. Reiss

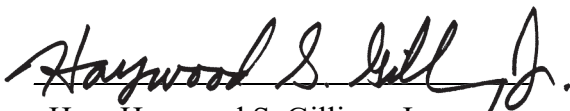
Joshua G. Hamilton
LATHAM & WATKINS LLP
Joshua G. Hamilton (#199610)
(joshua.hamilton@lw.com)
Michael J. Reiss (#275021)
(michael.reiss@lw.com)
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: 424 653 5500

LATHAM & WATKINS LLP
James E. Brandt (pro hac vice)
(james.brandt@lw.com)
1271 Avenue of the Americas
New York, NY 10020
Tel: 212 906 1200

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (pro hac vice)
(richard.slack@weil.com)
Jessica Liou (pro hac vice)
(jessica.liou@weil.com)
Matthew Goren (pro hac vice)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
425 Market St., 26th Floor
San Francisco, CA 94105
Tel: (415) 496-6723
Fax: (650) 636 9251

*Attorneys for the Debtors and
Reorganized Debtors*


Hon. Haywood S. Gilliam, Jr.